



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW
DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

December 18, 2023

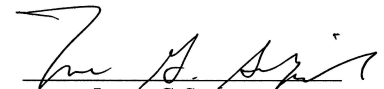
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Application GRANTED. Defendant shall produce a copy of the certified, Bates-stamped record to Plaintiff by **December 29, 2023**.

VIA ECF

Hon. Lorna G. Schofield
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Dated: December 18, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *A.P. v. N.Y.C. Dep't of Education*, 23-cv-6651 (LGS)(RWL)

Dear Judge Schofield:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, the Honorable Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.*, as well as for this action.

I write to respectfully request a 10-day extension of the deadline, from December 19, 2023 to December 29, 2023, to produce to Plaintiff a copy of the certified, Bates-stamped administrative record. Plaintiff consents to this request. This is the first request for an extension of that deadline. Due to the sudden and severe illness of the undersigned for the past week, I was unable to make this request earlier. Additionally, the requested extension will allow the staff at the Impartial Hearing Office adequate time to review and certify the record. Finally, as Plaintiff's fee application is not due until January 19, 2024, the requested extension will not affect the current briefing schedule.

Accordingly, Defendant respectfully requests that its time to produce a copy of the certified, Bates-stamped administrative record to Plaintiff be extended to December 29, 2023. Thank you for considering this request.

Respectfully submitted,

/s/

Martha Nimmer, Esq.
Special Assistant Corporation Counsel

cc: Francesca Antorino, Esq. (via ECF)